

SECOND DECLARATION OF TYLER BROOME
Pursuant to 28 U.S.C. § 1746

I, Tyler Broome, hereby state that I have personal knowledge of the facts set forth below and, if called to testify, I could and would testify as follows:

1. I am a United States citizen. I work as an Investigator for the Federal Trade Commission (“FTC”) in the Bureau of Consumer Protection’s Division of Marketing Practices. The Division of Marketing Practices investigates persons and entities that may be violating the FTC Act and other laws enforced by the FTC. My office address is 600 Pennsylvania Avenue, NW, CC-8563, Washington, DC 20580.
2. This second declaration details additional financial activity associated with the defendants that was derived from documents obtained after the filing of *Federal Trade Commission vs. THEFBAMACHINE, Inc., et al.*, Case No. 24-cv-6635 in the United States District Court for the District of New Jersey on June 3, 2024.
3. In my declaration dated May 16, 2024 (PX 18), I reported a net consumer payment figure ranging from approximately \$11,104,841.89 to \$17,916,836.35.
4. After the filing, the FTC received documents from Intuit, where it was shown that FBA SUPPORT NJ CORP held a merchant account (account number [REDACTED] 8522). The ‘contact name’ listed for the Intuit merchant account was Steven Rozenfeld – see the screenshot below of the Account Enrollment Application provided by Intuit.

Merchant Business Information	
Federal Tax ID	[REDACTED] 9328
Business Entity Type	Corporation
Applicant Email Address	steven@fba.support
Phone	[REDACTED] 9040
Contact Name	STEVEN ROZENFELD
Business Industry	B2B
Business Establishment Date	2019-12-17
Legal Business Name	FBA SUPPORT NJ CORP
Doing Business As (DBA)	FBA SUPPORT NJ CORP

5. Transaction detail was provided for sales that were dated between December 8, 2020 and June 2, 2024. Several of the counterparties in these transactions were identified to be consumers.
6. I observed deposits from Intuit made to multiple defendant bank accounts over the same time frame as the Intuit sales. In all, I estimate the defendant accounts to have received a net total (credits less debits) of approximately \$4,858,617.38 from Intuit. For a breakdown of the amounts associated with each defendant account, see the table below.

Counterparty	Intuit		
Account Name	Sum of Credit	Sum of Debit	Net Intuit Deposits
FBA SUPPORT NJ CORP	\$ 4,599,908.81	\$ 177,023.39	\$ 4,422,885.42
Daily Distro LLC	\$ 224,550.05	\$ 512.54	\$ 200,000.00
Passive Scaling Inc	\$ 200,000.00		\$ 224,037.51
3PL LOGISTIC AUTOMATION INC	\$ 10,000.00		\$ 10,000.00
FBA Support LLC	\$ 2,385.81	\$ 691.36	\$ 1,694.45
Grand Total	\$ 5,036,844.67	\$ 178,227.29	\$ 4,858,617.38

7. Since it was observed that consumers were making payments to the Intuit merchant account, I have added this net amount onto the previously calculated minimum net consumer payment figure in PX 18. As of this declaration, I estimate the net consumer payment figure to be approximately \$15,963,459.27.
8. Adding in additional net merchant deposits amounting to \$2,841,567.94, I estimate the high-end net consumer payment figure to be approximately \$18,805,027.21. For a breakdown of the additionally observed merchant deposits made to defendant accounts, see the table below.

Additional Merchant Accounts	Sum of Credit	Sum of Debit	Net Merchant Deposits
STRIPE	\$ 2,141,730.67	\$ 55,739.97	\$ 2,085,990.70
FBA Support LLC	\$ 1,994,491.28	\$ 49,940.32	\$ 1,944,550.96
Daily Distro LLC	\$ 128,538.92	\$ 5,779.62	\$ 122,759.30
1HR DELIVERIES INC	\$ 18,700.47	\$ 20.03	\$ 18,680.44
Swipe4Free	\$ 520,474.24	\$ 34,752.89	\$ 485,721.35
SALES SUPPORT NEW JERSEY INC	\$ 520,474.24	\$ 34,752.89	\$ 485,721.35
Payoneer	\$ 237,838.09		\$ 237,838.09
1HR DELIVERIES INC	\$ 215,134.47		\$ 215,134.47
Daily Distro LLC	\$ 15,985.80		\$ 15,985.80
FBA Support LLC	\$ 6,717.82		\$ 6,717.82
Merchant Svrs	\$ 33,237.15	\$ 1,219.35	\$ 32,017.80
SALES SUPPORT NEW JERSEY INC	\$ 33,237.15	\$ 1,219.35	\$ 32,017.80
Grand Total	\$ 2,933,280.15	\$ 91,712.21	\$ 2,841,567.94

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 22, 2024
Washington, D.C.



Tyler Broome